

IN THE UNITED STATES DISTRICT COURT

FOR THE EASTERN DISTRICT OF PENNSYLVANIA

UNITED STATES OF AMERICA	:	CRIMINAL NO. 24-
v.	:	DATE FILED:
TANYA WHYTE-FRANCIS	:	VIOLATIONS:
	:	18 U.S.C. § 371 (conspiracy to commit
	:	bribery – 1 count)
	:	18 U.S.C. § 201 (bribery - 1 count)
	:	Notice of forfeiture

INFORMATION

COUNT ONE

THE UNITED STATES ATTORNEY CHARGES THAT:

At all times relevant to this information:

1. Defendant TANYA WHYTE-FRANCIS was a United States Postal Carrier employed by the United States Postal Service ("USPS") and was therefore a "public official" as defined by Title 18, United States Code, Section 201(a)(1).
2. Defendant TANYA WHYTE-FRANCIS was a postal carrier at the Levittown Post Office, located at 7200 New Falls Road in Levittown, Pennsylvania, and was responsible for delivering USPS packages to addresses along an assigned postal route.
3. As a postal carrier, defendant TANYA WHYTE-FRANCIS owed the USPS the duty to, among other things: (a) ensure the security and integrity of the mail; (b) safeguard the mail against use by individuals and enterprises engaged in criminal activity, including trafficking in narcotics; (c) deliver the mail to the specified addressee; (d) handle

undeliverable mail in accordance with USPS policies and regulations; and (e) correctly and accurately record the delivery of each USPS package sent via Priority Mail.

THE CONSPIRACY

4. From at least in or about February 2019, through on or about June 23, 2020, in Levittown, in the Eastern District of Pennsylvania, and elsewhere, defendant

TANYA WHYTE-FRANCIS

conspired and agreed, together with Person A and Person B, both known to the United States Attorney, and others known and unknown to the United States Attorney, to commit offenses against the United States, that is, multiple acts of bribery of a public official in return for being influenced in the performance of an official act as defined in 18 U.S.C. § 201(a)(3) and being induced to do or omit to do any act in violation of her official duty, in violation of 18 U.S.C. § 201(b)(2)(A) and (C).

MANNER AND MEANS

It was a part of the conspiracy that:

5. Defendant TANYA WHYTE-FRANCIS used her official position with the United States Postal Service to support the illicit transportation and delivery of packages containing marijuana to Person A and Person B.

6. Defendant TANYA WHYTE-FRANCIS provided Person B with a list of addresses along her postal route to use as addresses on packages to be mailed to Levittown, Pennsylvania.

7. Person A and Person B and other conspirators mailed and caused to be mailed packages containing marijuana via USPS from California, and addressed to Person A, Person B, and “Kaleem Fraites,” an alias of Person B, at addresses on defendant TANYA

WHYTE-FRANCIS's postal route.

8. Person A and Person B then alerted defendant TANYA WHYTE-FRANCIS to the dates that the packages containing marijuana were scheduled to arrive at the Levittown Post Office.

9. After the packages arrived at the Levittown Post Office, defendant TANYA WHYTE-FRANCIS met with Person A or Person B at various locations on defendant WHYTE-FRANCIS's postal route, to deliver the packages to them.

10. Person A and Person B paid cash either at the time of the delivery or later via CashApp to defendant TANYA WHYTE-FRANCIS in exchange for receiving the packages containing marijuana.

OVERT ACTS

In furtherance of the conspiracy, and to accomplish its objective, defendant TANYA WHYTE-FRANCIS, Person A and Person B, both known to the United States Attorney, and others known and unknown to the United States Attorney, committed the following overt acts, among others, in the Eastern District of Pennsylvania, and elsewhere:

1. On or about February 12, 2019, in California, a person unknown to the United States Attorney placed in the U.S. mail two packages (USPS Tracking Numbers XX642679 and XXX710032) containing marijuana addressed to Person A at an address located along defendant TANYA WHYTE-FRANCIS's postal route.

On or about February 15, 2019:

2. While on duty, defendant TANYA WHYTE-FRANCIS met with Person A on the street along her postal route in Levittown and gave Person A the two packages (USPS Tracking Numbers XX642679 and XX710032) that contained marijuana.

3. Defendant TANYA WHYTE-FRANCIS received a payment via CashApp from Person B, using his alias “Kaleem Fraites,” in exchange for defendant WHYTE-FRANCIS’s delivery of the packages containing marijuana.

4. On or about February 20, 2019, in California, a person unknown to the United States Attorney placed in the U.S. mail a package containing marijuana (USPS Tracking Number XX009389) addressed to Person A at an address located along defendant TANYA WHYTE-FRANCIS’s postal route.

On or about February 22, 2019:

5. While on duty, defendant TANYA WHYTE-FRANCIS met with Person A on the street along her postal route and gave Person A the package (USPS Tracking Number XX009389) that contained marijuana.

6. Defendant TANYA WHYTE-FRANCIS received a payment via CashApp from Person B, using his alias, “Kaleem Fraites,” in exchange for defendant WHYTE-FRANCIS’s delivery of the package containing marijuana.

7. On or about February 28, 2019, in California, a person unknown to the United States Attorney placed in the U.S. mail two packages containing marijuana (USPS Tracking Numbers 201798 and XX781142) addressed to Person B and “A Ringham,” respectively, at an address located along defendant TANYA WHYTE-FRANCIS’s postal route.

On or about March 2, 2019:

8. While on duty, defendant TANYA WHYTE-FRANCIS met with Person A in Levittown on the street along defendant WHYTE-FRANCIS’s postal rout and gave him the two packages (USPS Tracking Number XX201798 and XX781142) that contained marijuana.

9. Person A gave defendant TANYA WHYTE-FRANCIS cash in exchange for defendant WHYTE-FRANCIS delivering the packages that contained marijuana.

10. In California, a person unknown to the United States Attorney placed in the U.S. mail a package containing marijuana (USPS Tracking Number XX213018) addressed to Person A at an address located along defendant TANYA WHYTE-FRANCIS's postal route.

11. On or about March 5, 2019, while on duty, defendant TANYA WHYTE-FRANCIS met with Person A in Levittown on the street along defendant WHYTE-FRANCIS's postal route and gave him the package (USPS Tracking Number XX213018) that contained marijuana.

12. On or about August 7, 2019, in California, a person unknown to the United States Attorney placed in the U.S. mail a package containing marijuana (USPS Tracking Number XX210408) addressed to Person A at an address located along defendant TANYA WHYTE-FRANCIS's postal route.

13. On or about August 10, 2019, while on duty, defendant TANYA WHYTE-FRANCIS met with Person B in Levittown on the street along defendant WHYTE-FRANCIS's postal route and gave him the package (USPS Tracking Number XX210408) that contained marijuana.

14. On or about August 12, 2019, Person B made a payment via CashApp to defendant TANYA WHYTE-FRANCIS in exchange for defendant WHYTE-FRANCIS delivering the package that contained marijuana.

15. On or about October 18, 2019, in California, a person unknown to the United States Attorney placed in the U.S. mail two packages (USPS Tracking Numbers XX324265 and XX324227) addressed to "K Fraites" at an address located along defendant TANYA WHYTE-FRANCIS postal route.

16. On or about October 21, 2019, while on duty, defendant TANYA WHYTE-FRANCIS met with Person A in Levittown on the street along defendant WHYTE-FRANCIS's postal route and gave him the two packages (USPS Tracking Numbers XX324265 and XX324227) that contained marijuana.

17. On or about October 26, 2019, Person B made a payment via CashApp to defendant TANYA WHYTE-FRANCIS in exchange for defendant WHYTE-FRANCIS delivering the packages that contained marijuana.

18. On or about November 9, 2019, in California, a person unknown to the United States Attorney placed in the U.S. mail four packages (USPS Tracking Numbers XX046396, XX210731, XX209596, and XX703900) addressed to "K Fraites" at an address located along defendant TANYA WHYTE-FRANCIS' postal route.

19. On or about November 12, 2019, while on duty, defendant TANYA WHYTE-FRANCIS met with Person A in Levittown on the street along defendant WHYTE-FRANCIS's postal route and gave Person A the four packages (USPS Tracking Numbers XX06396, XX210731, XX209596, and XX703900) that contained marijuana.

20. On or about November 16, 2019, Person B made payments via CashApp to defendant TANYA WHYTE-FRANCIS in exchange for defendant WHYTE-FRANCIS delivering the four packages that contained marijuana.

21. On or about November 30, 2019, in California, a person unknown to the United States Attorney placed in the U.S. mail a package containing marijuana (USPS Tracking Number XX816336) addressed to Person A at an address located along defendant TANYA WHYTE-FRANCIS's postal route.

On or about December 2, 2019:

22. While on duty, defendant TANYA WHYTE-FRANCIS met with Person A in Levittown on the street along defendant WHYTE-FRANCIS's postal route and gave Person A the package (USPS Tracking Number XX816336) that contained marijuana.

23. Person A gave defendant TANYA WHYTE-FRANCIS cash in exchange for defendant WHYTE-FRANCIS delivering the package that contained marijuana.

24. On or about June 20, 2020, in California, a person unknown to the United States Attorney placed in the U.S. mail a package containing marijuana (USPS Tracking Number XX704645) addressed to Person A at an address located along defendant TANYA WHYTE-FRANCIS's postal route.

25. On or about June 23, 2020, while on duty, defendant TANYA WHYTE-FRANCIS met with Person A in Levittown on the street along defendant WHYTE-FRANCIS's postal route and gave Person A the package (USPS Tracking Number 704645) that contained marijuana.

All in violation of Title 18, United States Code, Section 371.

COUNT TWO

THE UNITED STATES ATTORNEY FURTHER CHARGES THAT:

1. Paragraphs 1 through 3 and 5 through 10 of Count One are incorporated here.

2. On or about December 2, 2019, in Levittown, in the Eastern District of Pennsylvania, defendant

TANYA WHYTE-FRANCIS,

a public official, directly and indirectly corruptly demanded, received, accepted and agreed to receive and accept a thing of value in return for being influenced in the performance of an official act, and in return for being induced to do and omit to do any act in violation of her official duties, that is, defendant TANYA WHYTE-FRANCIS demanded, sought, received, accepted, and agreed to receive and accept cash from Person A, known to the United States Attorney, in return for the diversion of a USPS package to Person A for the purpose of the distribution of marijuana contained within the package.

In violation of Title 18, United States Code, Section 201(b)(2)(A) and (C).

NOTICE OF FORFEITURE

THE UNITED STATES ATTORNEY FURTHER CHARGES THAT:

1. As a result of the violations of Title 18, United States Code, Sections 201 and 371, as set forth in this information, defendant

TANYA WHYTE-FRANCIS

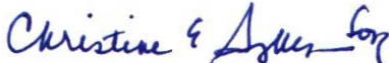
shall forfeit to the United States of America any property, real or personal, that constitutes or is derived from proceeds traceable to the commission of such violations, including, but not limited to, the sum of \$6,000.

2. If any of the property subject to forfeiture, as a result of any act or omission of the defendant:

- (a) cannot be located upon the exercise of due diligence;
- (b) has been transferred or sold to, or deposited with, a third party;
- (c) has been placed beyond the jurisdiction of the Court;
- (d) has been substantially diminished in value; or
- (e) has been commingled with other property which cannot be divided without difficulty;

it is the intent of the United States, pursuant to Title 28, United States Code, Section 2461(c), incorporating Title 21, United States Code, Section 853(p), to seek forfeiture of any other property of the defendant up to the value of the property subject to forfeiture.

All pursuant to Title 28, United States Code, Section 2461(c) and Title 18, United States Code, Section 981(a)(1)(C).



JACQUELINE C. ROMERO
UNITED STATES ATTORNEY

No. _____

UNITED STATES DISTRICT COURT

Eastern District of Pennsylvania

Criminal Division

THE UNITED STATES OF AMERICA

vs.

TANYA WHYTE-FRANCIS

INFORMATION

Counts

18 U.S.C. § 371 (conspiracy to commit bribery – 1 count)

18 U.S.C. § 201 (bribery - 1 count)

Notice of forfeiture

A true bill.

Foreperson

Filed in open court this _____ day,
Of _____ A.D. 20 _____

Foreperson

Bail, \$ _____
